



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

May 13, 1997

Gerry Brown  
Manager, Safety and Environment  
Ash Grove Cement Co.  
3801 E Marginal Wy S  
Seattle, WA 98134

Dear Mr. Brown:

Ash Grove Cement Plant  
Notice of Construction No. 6708

PSAPCA has received your letter dated April 17, 1997 requesting the modification of Condition No. 7 in Order of Approval No. 5730.

The following questions result from the review of your letter:

- There is a reference to 40 CFR 60, Appendix A, Method 18 on page 3. Is this actually a reference to the table "Conversion Factor for Concentration" in Method 19 Section 2?
- The equations on Page 3 use dscfm for stack airflow. Please describe how Ash Grove will convert the actual measured cfm stack flow to dscfm?
- Please explain the DAS PPMC and the LOGGER PPMC from the table "Startup January 27 - 29, 1997,"
- Page 3 indicates the measurements of SO<sub>2</sub> in the range 0 - 1000 ppm were done by the Lear Siegler. Please provide information on the calibration of this instrument.
- Your proposal includes a 422 ppm SO<sub>2</sub> main stack limit to be verified by measurement of stack flow. Why couldn't this stack concentration limit be verified directly by using the Lear Siegler during the preheat part of startup?

If you have any questions please contact me at (206) 689-4055 in Seattle.

Sincerely,

Fred L. Austin  
Air Pollution Engineer

FLA:mj

Cc: D. S. Kircher  
J. M. Willenberg  
E. M. Gilpin

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

AGCS2M002243

SEA0646  
printed on recycled paper